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FILED

FEB 28 2020

IN THE UNITED STATES COURT FOR
NORTHERN DISTRICT OF ILLINOIS

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

HANNAH BINKS
4117 BACK WOODS RD
WESTMINSTER MD 21158

Plaintiff,

vs.

THE BOEING COMPANY
100 NORTH RIVERSIDE PLAZA,
CHICAGO, IL 60606

Defendant

Case No.:

COMPLAINT FOR EMPLOYMENT
DISCRIMINATION AND OUTRAGE

Case 1:20-cv-01495
Judge John Z. Lee
Magistrate Judge Sidney I. Schenkier

NATURE OF THE ACTION

This is an action brought under Title VII of the Civil Rights Act of 1964, as amended, and the Illinois Human Rights Act against the Defendant, the Boeing Company, to correct unlawful employment practices on the basis of sex and/or opposition to unlawful sex discrimination, and to provide appropriate relief to Hannah Binks, a contract engineer at Boeing and a potential employee who was denied employment based on discriminatory actions at a Boeing facility.

Boeing discriminated against Hannah by terminating her contract at the Charleston plant after 6 days working there. Hannah was told that Boeing does not want her kind in Charleston. This was done in front of co-workers and was extremely embarrassing and discriminatory.

1 Boeing then denied employment to Hannah at both the Florida and
2 California facilities based on the same discrimination that occurred in Charleston.
3

4 **JURISDICTION AND VENUE**

- 5 1. The plaintiff, Hannah Binks is a citizen of the state of Maryland
6
7 2. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1332
8 because the parties are diverse and the amount in controversy exceeds
9 \$75,000.
10
11 3. The Court has person jurisdiction because Boeing has its corporate office
12 based in Illinois.
13
14 4. Illinois is the correct venue because the same discriminatory practices
15 occurred at 3 different plants all under the control of Boeing corporate in
16 Illinois.
17
18 5. This action is authorized and instituted pursuant to sections 706(f)(1) and
19 (3) of Title VII
20
21 This action is also authorized and instituted pursuant to the Illinois Human
22 Rights Act
23
24 6. A complaint was filed with the EEOC and a right to sue letter was issued.

25 **PARTIES**

- 26 7. I, Hannah Binks, am a Maryland state resident.
27
28 8. Defendant Boeing is a corporation based in Illinois

1 9. Defendant if not a federal government agency and the plaintiff has filed a
2 charge against the defendant
3

4 10.The EEOC has issued a Notice of Right to Sue. Exhibit 1

5 11.The defendant discriminated against the plaintiff based on gender
6

7 12.The defendant failed to hire the Plaintiff
8

9
10 **Amount in Controversy**

11 13.Plaintiff is seeing \$10,000,000 in damages
12

13
14 14.The Plaintiff was denied employment
15

16 15.The defendant discriminated against me beginning August 2019
17
18
19
20

21 **Outrage**

22 **Cause of Action 1**
23
24

25 16. On August 12, 2019 I reported to work at Boeing in Charleston SC.

26 17. I met my manager, Josh Blank, that morning, his first response to me
27 was "I was expecting a woman"
28

1 18. I told him that morning I would need Wednesday Aug 14th and
2 Tuesday Aug 20th to return to Maryland.
3

4 19. Josh replied that “that won’t be a problem, your accounts probably
5 wont be set up yet anyway”
6

7 20. I was out Aug 14th as planned and returned Aug 15th. No issues upon
8 return.
9

10 21. I was out Aug 20th as planned, but upon return I was called into an
11 office ant told that due to Boeings attendant policy I was being let go.
12

13 22. Josh also told me that “Boeing did not want my kind in Charleston.
14

15 23. This was also sent to me via email
16

17 24. I was escorted out in front of my co-workers and peers.
18

19 25. I contacted Boeing HR regarding this. They referred me to Boeing
20 ethics.
21

22 26. I was told by Boeing ethics that the attendance policy was that I must
23 notify Boeing of absences which I had done.
24

25 27. Ethics said they would investigate and provide a written report of the
26 findings.
27

28 28. I was told by Ethics that the investigation was complete, but they
29 would not be providing a report of the findings like earlier stated.
30

31 29. This was incredibly embarrassing and humiliating to me.

1 30. I have had multiple counseling sessions and lost many nights sleep
2 regarding this.
3

4
5 **Discriminatory hiring**
6

7 **Cause of Action 2**

8 31. All previous statements are incorporated

9
10 32. I applied for as was offered positions at both Florida and California
11 locations.

12 33. Both times the positions were rescinded or denied to me.

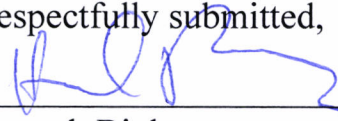
13
14 34. Both times the was due to the "Charleston Incident"

15
16
17
18 **Prayer for relief**
19

20
21 Wherefore I request that this court:

22 35. Grant the plaintiff damages, including punitive in the amount of
23 \$10,000,000
24

25 36. Any other relief as this court finds appropriate.
26
27
28

1 Respectfully submitted,
2 
3 _____

4 Hannah Binks

5 pro-se

6 4117 Bac Woods Rd

7 Westminster, MD 21158

8 410-980-5065
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U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
NOTICE OF RIGHT TO SUE (ISSUED ON REQUEST)

To: **Hannah N. Binks**
4117 Back Woods Rd
Westminster, MD 21158

From: **Baltimore Field Office**
G.H. Fallon Federal Building
31 Hopkins Plaza, Suite 1432
Baltimore, MD 21201

☐

On behalf of person(s) aggrieved whose identity is
CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

415-2019-01580

James Swan,
Investigator

(410) 801-6727

(See also the additional information enclosed with this form.)

NOTICE TO THE PERSON AGGRIEVED:

Title VII of the Civil Rights Act of 1964, the Americans with Disabilities Act (ADA), or the Genetic Information Nondiscrimination Act (GINA): This is your Notice of Right to Sue, issued under Title VII, the ADA or GINA based on the above-numbered charge. It has been issued at your request. Your lawsuit under Title VII, the ADA or GINA **must be filed in a federal or state court WITHIN 90 DAYS of your receipt of this notice**; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

☐

More than 180 days have passed since the filing of this charge.

☒

Less than 180 days have passed since the filing of this charge, but I have determined that it is unlikely that the EEOC will be able to complete its administrative processing within 180 days from the filing of this charge.

☒

The EEOC is terminating its processing of this charge.

☐

The EEOC will continue to process this charge.

Age Discrimination in Employment Act (ADEA): You may sue under the ADEA at any time from 60 days after the charge was filed until 90 days after you receive notice that we have completed action on the charge. In this regard, **the paragraph marked below applies to your case:**

☐

The EEOC is closing your case. Therefore, your lawsuit under the ADEA **must be filed in federal or state court WITHIN 90 DAYS of your receipt of this Notice**. Otherwise, your right to sue based on the above-numbered charge will be lost.

☐

The EEOC is continuing its handling of your ADEA case. However, if 60 days have passed since the filing of the charge, you may file suit in federal or state court under the ADEA at this time.

Equal Pay Act (EPA): You already have the right to sue under the EPA (filing an EEOC charge is not required.) EPA suits must be brought in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible**.

If you file suit, based on this charge, please send a copy of your court complaint to this office.

On behalf of the Commission



12/5/2019

Enclosures(s)

Rosemarie Rhodes,
Director

(Date Mailed)

CC:

David Wuerch, HR
THE BOEING COMPANY
3003 W. Casino Road
Mailcode: 074-02
Everett, WA 98204